

Cole v. Collier

Plaintiffs' Second Amended Exhibit List **UPDATED COURT COPY**

June 19, 2017 Hearing

No.	Description	Beg. Bates/D.E.	Agreed	Admitted	Denied
1.	Diagram of Pack Unit (with and without witnesses' markings)	Marshall Ex. 7			
2.	Photos of Pack Unit	Multiple		X	
	Barbershop	BAILEY 105348		X	
	Lower Admin. Hallway	BAILEY 105351		X	
	Craft shop	BAILEY 105380		X	
	Window 1	2014-8-26 14.03.14		X	
	Window 2	2014-8-26 13.53.57		X	
	E-Dorm Bunk View	2014-08-26 13.03.03		X	
	Windows poster	2014-08-26 13.26.14		X	
	Showers	2014-08-26 13.29.48		X	
	chow	2014-08-26 13.33.52		X	
	Bed with Window	2014-08-26 13.53.28		X	
	Power Breezer 1	P0067427		X	
	Power Breezer 2	P0067428		X	
	Power Breezer with TV	P0067429		X	
	Water with telephone	P0067430		X	
	Thermometer 1	P0067431		X	
	Thermometer 2	P0067432		X	
	Building Dayroom	2014-08-26 14.04.19		X	
	Building Dorm 2	2014-08-26 13.53.43			
	Gym 1	2014-08-26 15.19.34		X	
	Gym 2	2014-08-26 15.19.37		X	
	Another infirmary bench	BAILEY 105361		X	
	Classroom in school	BAILEY 105375		X	
	E dorm photos	TDCJ 81336-40		X	
	Education pictures	BAILEY 105367-71		X	
	Education bench	BAILEY 105372			
	Comode bulletin board	BAILEY 105389		X	

Cole v. Collier

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June 19, 2017 Hearing

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	Infirmary hall	BAILEY 105356		X	
	Infirmary	BAILEY 105355		X	
	Old photo of building dorm	TDCJ 81353		X	
2A	Infirmary Posters	BAILEY 105358		X	
2A1	Heat Illness Poster			X	
2B	Library Photo	BAILEY 105373		X	
3.	Pack Unit Web Profile	P0066781		X	
4.	Map of TDCJ Units	P0066783			
5.	Prof. Sager Reports, Exhibits, NWS data, and Logger Data	340, App. 454		X	
6.	Pack Unit Weather Records Summary	P00784		X	
7.	National Oceanic and Atmospheric Administration – What is a Heat Index?	340, App. 1023		X	
8.	Environmental Protection Agency – Excessive Heat Guidebook	340, App. 1026		X	
9.	Center for Disease Control – National Institute for Occupational Safety and Health – Workplace Safety and Health Topic, “Heat Stress”	340, App. 1067		X	
10.	NOAA Climate Maps August 2016, July 2016, June 2016	P0066785		X	
11.	National Weather Service – Heat Index Chart	340, App. 1179		X	
12.	National Weather Service – Heat Wave Major Summer Killer	340, App. 1181		X	
13.	National Weather Service – Calendar of Data for 2016 Summer	P0067752			
14.	NWS Weather Alerts – July 2016	P0067395		X	
15.	NWS 30 day forecast	P0066787, P0067749			
16.	TDCJ Interrogatory Responses in <i>Webb</i> with heat illnesses (AEO)	N/A		X	
17.	Chart with Plaintiffs' Medical Conditions and Medications (demonstrative)	P0067397			
18.	Heat-related death autopsies and office of the inspection general files	Multiple		X	
	· Archie White			X	
	· Anselmo Lopez			X	
	· James Moore			X	
	· Charles Finke			X	
	· Gary Gemma			X	

Cole v. Collier

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June 19, 2017 Hearing

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	· Carl Green			X	
	· Darrel Wafer			X	
	· John Cardwell			X	
	· Ricky Robertson			X	
	· James Shriver			X	
	· Dionicio Robles			X	
	· Douglas Hudson			X	
	· Larry McCollum			X	
	· Thomas Meyers			X	
	· Robert Webb			X	
	· Charles Cook			X	
	· Michael Martone			X	
	· Alexander Togonidze			X	
	· Kenneth James			X	
	· Kelly Marcus			X	
	· Daniel Alvarado			X	
	· Rodney Adams			X	
	· Albert Hinojosa			X	
19.	Heat Deaths in TDCJ Summary Chart				
	TDCJ Heat Illness Summary Charts			X	
	Heat Illnesses in July 2012	UTMBEmails000 002673		X	
	Heat Illnesses in June 2012 (color)	341, App. 1295		X	
20.	Heat Illness in June 2012	UTMBEmails000 010716		X	
	Heat Illness in summer 2013	UTMBEmails000 010722		X	
	Executive Summary, 2011	TDCJ 83455		X	
	Executive Summary, 2012	TDCJ 83241		X	
	Executive Summary, 2013	TDCJ047704		X	
	Executive Summary, 2014	TDCJ045749		X	
	End of Year Report	TDCJ 112597		X	
21.	Heat Illnesses in TDCJ Summary Chart			X	
22.	Excerpts of Medical Records of Keith Cole	Multiple		X (without index)	
23.	Excerpts of Medical Records of Jackie Brannum	Multiple		X (without index)	

Cole v. Collier

Plaintiffs' Second Amended Exhibit List **UPDATED COURT COPY**

June 19, 2017 Hearing

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24.	Excerpts of Medical Records of Richard King	Multiple		X (without index)	
25.	Excerpts of Medical Records of Fred Wallace	Multiple		X (without index)	
26.	Excerpts of Medical Records of Marvin Ray Yates	Multiple			
27.	Excerpts of Medical Records of Aaron Smith	Multiple			
28.	Excerpts of Medical Records of Michael Denton	Multiple		X (without index)	
29.	Excerpts of Medical Records of Laddy Valentine	Multiple			
30.	UTMB CMHCC Heat Related Illness Charts (April – July 2016)	TDCJ 111527		X	
31.	Chart of Pack Heat Illnesses 2012–2014	TDCJ 83788		X	
32.	Pack Unit Employee Heat Related Illness Report (April 2013)	BAILEY 32212		X	
33.	Pack Unit Employee Heat Related Illness Report (August 2013)	BAILEY 32230		X	
34.	Pack Unit Inmate Heat Related Illness Report (J.C., July 2015)	BAILEY 56081, 82127		X	
35.	Pack Unit Inmate Heat Related Illness Report (C. H., July 2016)	BAILEY 103841			
36.	Pack Unit Inmate Heat Related Illness Report (L.A., July 2016)	TDCJ 111323, BAILEY 103858		X	
37.	Pack Unit Inmate Heat Related Illness Report (A.C., Aug. 2016)	TDCJ 111438		X	
38.	Pack Unit Inmate Heat Related Illness Report (K.W. Aug. 2016)	BAILEY 119190		X	
39.	Pack Unit Inmate Heat Related Illness Report (P.B., Aug. 2015)	BAILEY 119206		X	
40.	Completed Heat Related Illness Reporting Forms and Associated Medical Records	Multiple		X	
41.	Emergency Action Center System Incident Reports	TDCJ 89835			
42.	TDCJ Temperature Extremes AD 10.64 rev. 6 (2008)	TDCJ017170		X	

Cole v. Collier

Plaintiffs' Second Amended Exhibit List **UPDATED COURT COPY**

June 19, 2017 Hearing

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43.	TDCJ Temperature Extremes AD 10.64 rev. 7 (2015)	TDCJ 77227		X	
44.	TDCJ Temperature Extremes AD-10.64 rev. 8 (2017)	TDCJ 114158		X	
45.	Heat Restrictions List (Pack Unit, April 2017)	BAILEY 124475		X	
46.	CMHCC Heat Stress Policy B-15.2 (2007)	TDCJ030430		X	
47.	CMHCC Heat Stress Policy D-27.2 (2015)	TDCJ 83495		X	
48.	TDCJ Swine Operation Policy	340, App. 1208			
49.	TDCJ SM-6.07 rev. 2 Nov. 2011	BAILEY 030488			
50.	TDCJ SM-6.07 rev. 4 May 2017	TDCJ 117089			
51.	TDCJ Offender Orientation Handbooks 2004, 2015, 2016, 2017	TDCJ 80159-80417, TDCJ 111928, P0066791		X (2017 only)	
52.	"Notice to Offenders"	340, App. 2053		X	
53.	TDCJ Heat Extremes Training Circular (2016)	TDCJ 111554			
54.	Training Pamphlet 2017	TDCJ 114925		X	
55.	Heat Precaution Checklist	BAILEY 22640			
56.	Heat Precaution Checklist	Marshall Ex. 10			
57.	TDCJ Heat Message (2011)	TDCJ - 04806			
58.	TDCJ Heat Message (2017)	TDCJ 114142		X	
59.	Pack Unit Respite Area Capacity Chart	BAILEY 98354		X	
60.	Training Video 2014				
61.	TDCJ Survey of Which Units Have Air Conditioning in Housing Areas	TDCJ 113038		X	
62.	TDCJ Survey of Which Units Have Air Conditioning in Housing Areas	TDCJ 82858		X	
63.	TDCJ Capacities and Populations as of 1/31/2011	TDCJ 112801			
64.	R. Eason Email re: Respite Areas July 24, 2015	TDCJ 82788		X	
65.	L. Linthicum Memo re: Ricky Robertson May 3, 2005	McCollum/ Robertson-54		X	
66.	R. Williams Email re: PEARL Problem List Sep. 24, 2011	TDCJ019383			
67.	T. Ohare Email re: Cool-Space Mar. 27, 2014	TDCJ030308			

Cole v. Collier

Plaintiffs' Second Amended Exhibit List **UPDATED COURT COPY**

June 19, 2017 Hearing

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68.	TDCJ Pack HVAC Replacements	TDCJ 85339			
69.	TDCJ New Installed A/C Projects September 2009 – June 2015	TDCJ 85339a			
70.	Project Master File Documents, Lewis Unit Install Condensing Unit Expansion Cellblock Shakedown Area	TDCJ 89622			
71.	Project Master File, Mountain View Unit Install Window Unit AC-OIG	TDCJ 89676			
72.	Project Master File, Stiles Unit Install AC 11 Building	TDCJ 89723			
73.	R. Eason Email re: J3 Infirmary Aug. 22, 2014	TDCJ 024135			
74.	S. Smock Email re: J3 Infirmary June 13, 2013	UTMBEmails000 006333			
75.	S. Smock Email re: Dawson June 18, 2010	TDCJ017832			
76.	R. Williams re: Heat Related Illness July 11, 2012	TDCJ014664			
77.	L. Linthicum Email re: Lease # 10604 Aug. 12, 2009	D00166199			
78.	D. Allison Memo re: RMC Meeting May 29, 2013	BAILEY032771			
79.	D. Allison Memo re: Meeting Minutes July 31, 2012	BAILEY032775			
80.	L. Linthicum Memo re: Heat Related Deaths June 26, 2009	TDCJ029581			
81.	H. Lara Memo re: Posted Heat Precaution	BAILEY 032043		X	
82.	F. Inmon Email re: NY Times Request June 18, 2012	TDCJ044138			
83.	F. Inmon Email re: TDCJ A/C on Units June 19, 2012	TDCJ022848			
84.	American Correctional Association Standard 4-415-3	<i>McCollum</i> , Doc. 301, App. 2537		X	
85.	American Correctional Association Standards Committee Minutes	340, App. 996		X	
86.	American Bar Association Standards on Treatment of Prisoners, 3d Ed.	P0066940		X	
87.	Texas Jail Standard, 3 Tex. Reg. 897 (Mar. 1978)	<i>McCollum</i> , Doc. 301, App. 2375		X	
88.	Arkansas Jail Standards	P0067398		X	

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June 19, 2017 Hearing

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89.	Arizona Department of Corrections Physical Plant Standards	<i>McCollum</i> , Doc. 301, App. 2305		X	
90.	New Mexico Department of Corrections Physical Plant Requirements	<i>McCollum</i> , Doc. 301, App. 2313		X	
91.	Tennessee Correctional Facilities Standards	<i>McCollum</i> , Doc. 301, App. 2353		X	
92.	Oklahoma Department of Corrections Standards for Inspections	<i>McCollum</i> , Doc. 301, App. 2368		X	
93.	North Carolina Administrative Code § 14J.1217	P0067347		X	
94.	Illinois Jail Standards	P0067394		X	
95.	List of Prison Systems with Air Conditioning (demonstrative)	P0067395			
96.	Department of Defense – Report Regarding Conditions at Guantanamo Bay Prison Facility	340, App. 1097		X	
97.	Icy Breeze Cooler with Instruction Manual & Receipt	P0066773			
98.	Photo of Port-a-cool	<i>McCollum</i> , Appx. 7150		X	
99.	Photo of Cool-Space	TDCJ 80073		X	
100.	Warden Wilder Memo re: Electrical service	BAILEY 127028			
101.	Several Emails re: Power Breezers	TDCJ 117150–117155			
102.	TDCJ Requisition of Air Evaporative Coolers May 17, 2017	BAILEY 127106			
103.	TDCJ Request for Quotation re: Mobile Air Circulators May 26, 2017	BAILEY 127042			
104.	Trak Engineering Appendix C	BAILEY 127164			
105.	R. Brown Expert Report & Exhibits	N/A		X	
106.	ASHRAE 55-2004 Graph Excerpt	<i>McCollum</i> , 301, App. 2575			
107.	Online TDCJ Unit Directory	<i>McCollum</i> , 300, App. 1387			
108.	TDCJ Purchase Order Change Notice re: Cool-space Aug. 13, 2014	TDCJ 81439			
109.	Email from Billy Hirsch February 8, 2017	TDCJ 117134			
110.	Articles Noted by Dr. Vassallo and Dr. McGeehin	511 - Plaintiffs' Exhibits 4–11, 14			

Cole v. Collier

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No.	Description	Beg. Bates/D.E.	Agreed	Admitted	Denied
111.	Preliminary Injunction Hearing Exhibits	511			
112.	June 1, 2017 Power Breezer Purchase Order & Spec Sheet	BAILEY 127158			
113.	Air Conditioning quotes from Carrier Rentals	P0067433-47, P0067740, P0067744		X	
114.	Email from B. Sears to K. Farguson (Sep. 2, 2014)	TDCJ047366		X	
115.	Demonstrative Summary of A/C in TDCJ	P0067750			
116.	Health Services Liaison Facility Type List	TDCJ 80441		X	
117.	AC Survey 08 31 2017 With Bed Counts	BAILEY 128715		X	
118.	Copy of Porta-Cool Loc. & Dec.	BAILEY 128690			
119.	TDCJ Chiller Rentals	BAILEY 128694			
120.	ASHRAE 62-2001	P0067782			
121.	Additional Carrier Rentals Quotes	P0067775-80			
122.	Excerpts from Grievances	BAILEY 128544		X	
A	Robert Jones	BAILEY 128545		X	
B	Harry Kerley	BAILEY 128855		X	
C	Douglas Collins 1	P0066766		X	
D	Douglas Collins 2	P0066762		X	
G	Keith Cole	BAILEY 126888		X	
H	John Ford	BAILEY 128639		X	
J	Billy Risley	BAILEY 126845		X	
K	Rusty Johnson	BAILEY 126899		X	
L	Ray Omelas	BAILEY 126908		X	
123.	Suggested Poster - 3 hours a day			X	
124.	Suggested Poster - 24 hours a day			X	
125.	17.6.15 Three month outlook.pdf				
126.	Hoerling et al 2013 JClim Texas-2011				
127.	Chart of offender location of heat-related illness	Linthicum Exh 014		X	
128.	WetBulb Globe Temperature.pdf				
129.	Herrera bed summary			X	
130.	Email to K. Farguson (Jul. 15, 2014)	TDCJ047398		X	
131.	TDCJ Heat Message (2012)	TDCJ 04809		X	
132.	TDCJ Heat Message (2013)	TDCJ 04813		X	
133.	TDCJ Heat Message (2014)	TDCJ 04818		X	
134.	TDCJ Heat Message (2015)	BAILEY 48921		X	
135.	TDCJ Heat Message (2016)	TDCJ 114142		X	